

1 Presented to the Court by the foreman of the  
2 Grand Jury in open Court, in the presence of  
3 the Grand Jury and FILED in the U.S.  
4 DISTRICT COURT at Seattle, Washington.

5 OCTOBER 9 2013

6 WILLIAM M. McCOOL, Clerk

7 By [Signature] Deputy

8 UNITED STATES DISTRICT COURT FOR THE  
9 WESTERN DISTRICT OF WASHINGTON  
10 AT SEATTLE

11 UNITED STATES OF AMERICA,

12 Plaintiff

13 v.

14 STEVEN LLOYD SADLER and  
15 JENNA M. WHITE,

16 Defendants.

CR 13

321 RSM

INDICTMENT

17 The Grand Jury charges that:

18 COUNT 1

19 (Conspiracy to Distribute Heroin, Methamphetamine, and Cocaine)

20 Beginning at a time unknown, but within the last five years, and ending on or  
21 about July 31, 2013, in Bellevue, within the Western District of Washington, and  
22 elsewhere, STEVEN LLOYD SADLER, JENNA M. WHITE, and others known and  
23 unknown, knowingly and intentionally did conspire to distribute heroin, a substance  
24 controlled under Schedule I, Title 21, United States Code, Section 812, and cocaine and  
25 methamphetamine, substances controlled under Schedule II, Title 21, United States Code,  
26 Section 812.  
27  
28

1 It is further alleged that this offense involved one kilogram or more of a mixture or  
2 substance containing heroin, 500 grams or more of a mixture or substance containing a  
3 detectable amount of methamphetamine, and 500 grams or more of a mixture and  
4 substance containing a detectable amount of cocaine.

5 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A),  
6 and 846.

7 **COUNT 2**  
8 **(Distribution of Heroin and Cocaine)**

9 On or about March 11, 2013, at Bellevue, within the Western District of  
10 Washington, STEVEN LLOYD SADLER and JENNA M. WHITE knowingly and  
11 intentionally did distribute heroin, a substance controlled under Schedule I, Title 21,  
12 United States Code, Section 812, and cocaine, a substance controlled under Schedule II,  
13 Title 21, United States Code, Section 812.

14 It is further alleged that this offense was committed during and in furtherance of  
15 the conspiracy charged in Count 1, above.

16 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
17 841(b)(1)(C).

18 **COUNT 3**  
19 **(Distribution of Cocaine)**

20 On or about June 13, 2013, at Bellevue, within the Western District of  
21 Washington, STEVEN LLOYD SADLER and JENNA M. WHITE knowingly and  
22 intentionally did distribute cocaine, a substance controlled under Schedule II, Title 21,  
23 United States Code, Section 812.

24 It is further alleged that this offense was committed during and in furtherance of  
25 the conspiracy charged in Count 1, above.

26 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
27 841(b)(1)(C).

**COUNT 4**  
**(Distribution of Cocaine)**

On or about July 8, 2013, at Bellevue, within the Western District of Washington, STEVEN LLOYD SADLER and JENNA M. WHITE knowingly and intentionally did distribute cocaine, a substance controlled under Schedule II, Title 21, United States Code, Section 812.

It is further alleged that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 5**  
**(Possession of Cocaine, Heroin, and Methamphetamine with Intent to Distribute)**

On or about July 31, 2013, at Bellevue, within the Western District of Washington, STEVEN LLOYD SADLER and JENNA M. WHITE knowingly and intentionally did possess, with intent to distribute, heroin, a substance controlled under Schedule I, Title 21, United States Code, Section 812, and cocaine and methamphetamine, substances controlled under Schedule II, Title 21, United States Code, Section 812.

It is further alleged that this offense involved one kilogram or more of a mixture or substance containing heroin, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, and fifty grams or more of methamphetamine (actual).

It is further alleged that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**ASSET FORFEITURE ALLEGATION**

Upon conviction of the offenses alleged in Counts 1 through 5 of the Indictment, the defendants, STEVEN LLOYD SADLER and JENNA M. WHITE, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses, and also shall forfeit any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses, including but not limited to the following property:

- a. 2007 BMW 525, bearing Washington license plates, AGB6519;
- b. Dan Wesson, .45 caliber semi-automatic pistol, serial number MR00954;
- c. \$3200 seized from STEVEN SADLER on July 31, 2013;
- d. \$1000 seized from STEVEN SADLER's residence on July 31, 2013;
- e. Unused postage stamps seized from STEVEN SADLER's residence on July 31, 2013;
- f. Vacuum and heat-sealing equipment seized from STEVEN SADLER's residence on July 31, 2013;

If any of the above described forfeitable property, as a result of any act or omission of the Defendants,

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third party;
3. has been placed beyond the jurisdiction of the Court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be divided without difficulty;

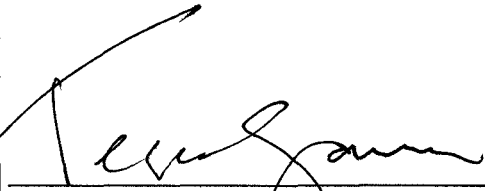
1 it is the intent of the United States, pursuant to Title 21, United States Code, Section  
2 853(p), to seek the forfeiture of any other property of the Defendants up to the value of  
3 the above described forfeitable property.

4 A TRUE BILL:

5 DATED:

6  
7 (Signature of Foreperson redacted pursuant to  
8 the policy of the Judicial Conference of the  
9 United States)

10 FOREPERSON

11  
12   
13 JENNY A. DURKAN  
14 United States Attorney

15   
16 TODD GREENBERG  
17 Assistant United States Attorney

18   
19 THOMAS M. WOODS  
20 Assistant United States Attorney